1	UNITED STATES DISTRICT COURT	
2	NORTHERN DISTRICT OF CALIFORNIA	
3	A DIHNIAN DHATNIA CAD)
4	ABHINAV BHATNAGAR,) Case No.: Case No. CV07-02669 (CRB)
5	Plaintiff, vs.)) PROPOSED PROTECTIVE ORDER
6)
7	JASON INGRASSIA, individually and in his official capacity; COUNTY OF))
8	CONTRA COSTA; and CITY OF) SAN RAMON.)	
9))
10	Defendants.	
11		
12	This matter is before the court upon Plaintiff's Motion for a Protective Order, filed on	
13	November 21, 2007, and Defendant Ingrassia's Motion to Strike, filed on November 28, 2007.	
14	Based upon the supporting and opposing documents submitted on these motions, all the	
15	documents contained in the record herein, and the motion hearing conducted on December 7,	
16 17	2007, the Court hereby issues the following protective order pursuant to Fed. R. Civ. Pro., Rule	
18	26(c):	
19		all be recorded by a stenographer and by
20		,
21	videotape. Defendant JASON INGRASSIA shall be excluded from the deposition	
22	room during this deposition, but is permitted to attend the deposition by video	
23	conference in a separate room from the witness. The parties shall confer and reach an	
24	agreement regarding all other logistical matters for the deposition of RICHARD HA.	
25	IT IS SO ORDERED.	
26	Dated: December, 2007	
27	_	
28	The Honorable Charles R. Breyer United States District Judge	

PROPOSED PROTECTIVE ORDER - PAGE 1 OF 1